

Exhibit 1

Jake Keester

From: Jake Keester
Sent: Tuesday, August 20, 2024 10:12 PM
To: eludwig@boviskyle.com
Cc: Leigh O'Dell; Chris Placitella; mparfitt@ashercraftlaw.com; bharrs@rmh-law.com; Morty Dubin; Kristen Fournier; Matthew Bush; susan.sharko@faegredrinker.com
Subject: J&J Talc - Objections to the Special Master's Order on Defendants' Motion to Compel Mr. Hess's Deposition Testimony
Attachments: Notice of Motion re Objection .pdf; PO on Objection.pdf; MDL (DNJ) Hess MTC Objections.pdf; M. Bush Objection Declaration.pdf

Counsel,

Attached is Defendants' Objections to the Special Master's Order on Defendants' Motion to Compel Deposition Testimony of Paul Hess that we will be filing shortly in *In re Johnson & Johnson Talcum Powder Products Marketing, Sales, Practices, And Products Liability Litigation*, 16-md-02738-MAS-RLS (D.N.J.). I will be sending the exhibits via Box link in a separate email.

We ask that you not share this brief with Mr. Hess or use it to prepare him for further deposition questioning.

Best,
Jake

Jake Keester
Associate

T: +1 212 790 5304 | E: JKeester@KSLAW.com | [Bio](#) | [vCard](#)

King & Spalding LLP
1185 Avenue of the Americas
34th Floor
New York, NY 10036



kslaw.com